PPG Industries

PPG Chlor-Alkali & Derivatives

Richard Andersen
SUPERINTENDENT DERIVATIVES

PPG Industries, Inc.
P. O. Box 1000
1300 PPG Drive
Lake Charles LA 70602 USA

January 28, 2011

Mr. Sanford Phillips
Office of Environmental Services
Waste Permits Division
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, LA 70821-4313

Re: Request for Extension, and
Petition for Written Approval to Burn Hazardous Waste
PPG Industries, Inc. - Lake Charles Facility
AI1255, PER 20090018, LAD 008086506

Dear Mr. Phillips:

PPG Industries, Inc. (PPG) owns and operates hazardous waste incinerators (Incinerators 1 and 2) that are subject to the Hazardous Waste Combustor National Emission Standard for Hazardous Air Pollutants (HWC NESHAP) codified in 40 CFR Part 63, Subpart EEE. PPG performed a comprehensive performance test (CPT) September 14 through September 15, 2010, in accordance with an approved test plan dated September 2008 (revised April 2010). PPG determined that the CPT was not able to demonstrate compliance with the HWC MACT HCl/Cl_2 emission standard (32 parts per million (ppm) expressed as chloride equivalents, dry basis corrected to 7 % oxygen) in accordance with §63.1219(a)(6). PPG requested and received approval from LDEQ to burn hazardous waste with restricted interim operating parameter limits (OPLs) on October 15, 2010.

As PPG previously communicated to LDEQ on January 4, 2011, testing in December 2010 also failed to demonstrate compliance with the HCl/Cl2 standard. In accordance with §63.1207(l)(1)(i), PPG ceased burning hazardous waste in Incinerators 1 and 2 under the interim operating requirements set forth by LDEQ. Since that time, PPG has done a complete overhaul of the secondary scrubber for Incinerators 1 and 2, including installing new scrubber packing. In accordance with §63.1207(h)(2), as incorporated as specific requirement 8 in the Incinerator Title V permit (2040-V3), PPG has performed

additional testing after the scrubber overhaul. Data from that testing indicates PPG can now operate in compliance with the HCl/Cl_2 standard while burning liquid waste.

In accordance with §63.1207(l)(3), PPG proposes to operate during this interim period with the following restrictive OPLs, in order to ensure compliance with all emission standards.

- Maximum Total Chloride Feed Rate — 5321 lb/hr (12-HRA)
- Secondary scrubber minimum pH — 9.2 (HRA)
- Maximum Semi-volatile Metals (SVM) Feed Rate — 0.059 lb/hr (12-HRA)

In addition, pursuant to §63.1207(d)(3), PPG respectfully requests LDEQ grant an additional 60-day extension to the current February 11, 2011, deadline to complete the CPT. LDEQ has the authority to grant this extension because it is out of PPG's control to complete testing by February 11, 2011, due to significant difficulty in scheduling all required contractors.

PPG respectfully requests LDEQ provide a written approval for the extension to complete the CPT and to allow burning of hazardous waste for the Incinerators 1 and 2 during this interim period as quickly as possible. If there are any questions or you need additional information contact Billy Salter at (337) 708-4243 or via e-mail at salter@ppg.com or Don Johnson at (337) 708-4789 or via e-mail at donjohnson@ppg.com .

Sincerely,

Richard Andersen,
Superintendent, Derivatives

Attachments

cc:

METCO ENVIRONMENTAL

File Number 10-443A

SUMMARY OF RESULTS

Numbers 1 and 2 Incinerator Stack

Condition I

Emission Parameter	Run Number 1	Run Number 2	Average
Total HCl/Cl_2 as Chloride – ppmvd[1]	36.743	42.204	39.474
Total HCl/Cl_2 as Chloride – lbs/hr	3.457	3.992	3.725

Condition II

Emission Parameter	Run Number 1	Run Number 2	Average
Total HCl/Cl_2 as Chloride – ppmvd[1]	25.868	25.616	25.742
Total HCl/Cl_2 as Chloride – lbs/hr	2.424	2.389	2.407

Condition III

Emission Parameter	Run Number 1	Run Number 2	Average
Total HCl/Cl_2 as Chloride – ppmvd[1]	49.988	52.084	51.036
Total HCl/Cl_2 as Chloride – lbs/hr	4.902	5.175	5.039

Condition IV

Emission Parameter	Run Number 1	Run Number 2	Average
Total HCl/Cl_2 as Chloride – ppmvd[1]	38.134	35.065	36.600
Total HCl/Cl_2 as Chloride – lbs/hr	3.658	3.337	3.498

[1] Corrected to 7% O_2

METCO ENVIRONMENTAL

File Number 10-443A

SUMMARY OF RESULTS
Numbers 1 and 2 Incinerator Stack
Condition I
Hydrogen Chloride and Chlorine

Run Number	1	2
Date	01/20/11	01/20/11
Time	0824-0940	0956-1111
Stack Flow Rate - ACFM	19,077	18,946
Stack Flow Rate – DSCFM[1]	18,073	17,892
% Water Vapor - % Volume	3.56	3.68
% CO_2 - % Volume	11.72	11.76
% O_2 - % Volume	7.80	7.60
% Excess Air @ Sampling Point	80.5	80.6
Stack Temperature - °F	81	82
Stack Pressure - "Hg	30.00	30.00
Percent Isokinetic	97.4	98.7
Volume Dry Gas Sampled – DSCF*	48.201	48.398
Hydrogen Chloride - mg	10.912	10.753
Hydrogen Chloride Emissions – ppmvd	5.273	5.175
Hydrogen Chloride Emissions – lbs/hr	0.541	0.526
Chlorine - mg	59.085	71.153
Chlorine Emissions – ppmvd	14.678	17.6
Chlorine Emissions – lbs/hr	2.931	3.480
Total HCl/Cl_2 as Chloride – mg	69.698	81.611
Total HCl/Cl_2 as Chloride – ppmvd	34.629	40.382
Total HCl/Cl_2 as Chloride – ppmvd[2]	36.743	42.204
Total HCl/Cl_2 as Chloride – lbs/hr	3.457	3.992

[1] 29.92 "Hg, 68°F (760 mm Hg, 20°C)
[2] Corrected to 7 percent oxygen.

METCO ENVIRONMENTAL

File Number 10-443A

SUMMARY OF RESULTS
Numbers 1 and 2 Incinerator Stack
Condition II
Hydrogen Chloride and Chloride

Run Number	1	2
Date	01/20/11	01/20/11
Time	1250-1405	1417-1433
Stack Flow Rate - ACFM	19,606	19,507
Stack Flow Rate – DSCFM[1]	18,138	18,048
% Water Vapor - % Volume	4.45	4.46
% CO_2 - % Volume	11.3	11.4
% O_2 - % Volume	7.9	7.9
% Excess Air @ Sampling Point	80.8	80.7
Stack Temperature - °F	88	88
Stack Pressure - "Hg	29.96	29.96
Percent Isokinetic	100.6	100.4
Volume Dry Gas Sampled – DSCF*	50.007	49.622
Hydrogen Chloride - mg	20.450	21.838
Hydrogen Chloride Emissions – ppmvd	9.525	10.250
Hydrogen Chloride Emissions – lbs/hr	0.981	1.051
Chlorine - mg	30.630	28.403
Chlorine Emissions – ppmvd	7.334	6.854
Chlorine Emissions – lbs/hr	1.470	1.367
Total HCl/Cl_2 as Chloride – mg	50.519	49.642
Total HCl/Cl_2 as Chloride – ppmvd	24.193	23.958
Total HCl/Cl_2 as Chloride – ppmvd[2]	25.868	25.616
Total HCl/Cl_2 as Chloride – lbs/hr	2.424	2.389

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[2] Corrected to 7 percent oxygen.

METCO ENVIRONMENTAL

File Number 10-443A

SUMMARY OF RESULTS
Numbers 1 and 2 Incinerator Stack
Condition III
Hydrogen Chloride and Chlorine

Run Number	1	2
Date	01/21/11	01/21/11
Time	0806-0922	0958-1113
Stack Flow Rate - ACFM	19,181	19,403
Stack Flow Rate – DSCFM[1]	18,414	18,517
% Water Vapor - % Volume	2.88	3.26
% CO_2 - % Volume	11.6	11.5
% O_2 - % Volume	7.5	7.4
% Excess Air @ Sampling Point	53.8	52.5
Stack Temperature - °F	80	81
Stack Pressure - "Hg	30.13	30.13
Percent Isokinetic	100.2	100.6
Volume Dry Gas Sampled – DSCF*	50.550	51.022
Hydrogen Chloride - mg	15.001	16.671
Hydrogen Chloride Emissions – ppmvd	6.912	7.610
Hydrogen Chloride Emissions – lbs/hr	0.723	0.801
Chlorine - mg	87.131	91.558
Chlorine Emissions – ppmvd	20.639	21.487
Chlorine Emissions – lbs/hr	4.199	4.396
Total HCl/Cl_2 as Chloride – mg	101.720	107.772
Total HCl/Cl_2 as Chloride – ppmvd	48.190	50.585
Total HCl/Cl_2 as Chloride – ppmvd[2]	49.988	52.084
Total HCl/Cl_2 as Chloride – lbs/hr	4.902	5.175

[1] 29.92 "Hg, 68°F (760 mm Hg, 20°C)
[2] Corrected to 7 percent oxygen.

METCO ENVIRONMENTAL

File Number 10-443A

SUMMARY OF RESULTS
Numbers 1 and 2 Incinerator Stack
Condition IV
Hydrogen Chloride and Chloride

Run Number	1	2
Date	01/21/11	01/21/11
Time	1240-1355	1409-1524
Stack Flow Rate - ACFM	19,351	19,494
Stack Flow Rate – DSCFM[1]	17,999	18,085
% Water Vapor - % Volume	4.23	4.35
% CO_2 - % Volume	11.4	11.4
% O_2 - % Volume	7.5	7.5
% Excess Air @ Sampling Point	53.6	53.6
Stack Temperature - °F	89	90
Stack Pressure - "Hg	30.11	30.11
Percent Isokinetic	101.9	100.1
Volume Dry Gas Sampled – DSCF*	50.236	49.583
Hydrogen Chloride - mg	27.825	21.378
Hydrogen Chloride Emissions – ppmvd	12.901	10.042
Hydrogen Chloride Emissions – lbs/hr	1.319	1.032
Chlorine - mg	50.112	49.198
Chlorine Emissions – ppmvd	11.944	11.881
Chlorine Emissions – lbs/hr	2.375	2.374
Total HCl/Cl_2 as Chloride – mg	77.174	69.989
Total HCl/Cl_2 as Chloride – ppmvd	36.790	33.804
Total HCl/Cl_2 as Chloride – ppmvd[2]	38.134	35.065
Total HCl/Cl_2 as Chloride – lbs/hr	3.658	3.337

[1] 29.92 "Hg, 68°F (760 mm Hg, 20°C)
[2] Corrected to 7 percent oxygen.